

EXHIBIT H

Ascend Global Privacy Policy

You have visited an Ascend Learning, LLC affiliate or brand website or registration page. Ascend Learning, LLC and its [affiliates and subsidiaries](#) worldwide (collectively “Ascend,” “we,” “our,” or “us”) value your privacy. This Global Privacy Policy (“Policy”) explains how Ascend collects, uses, and discloses information from or about you when you use our websites, services, applications, software, products, and other digital services that link to this policy, or if you otherwise engage in business with us (collectively the “Services”).

This Privacy Policy applies to the Services we provide throughout the world. Any additional privacy terms that relate to specific products or services should be read in conjunction with this Policy. We offer the Services through a wide range of businesses and under many different brands. The data controller of your information will be the Ascend entity which provides the Services to you or does business with you, except when the Ascend entity is designated as the data processor, as fully defined below. You can find out more information about Ascend, including a list of our brands, [here](#), and you can find contact information for each of our brands in the Contact Us Section below.

PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND HOW WE HANDLE YOUR INFORMATION. BY USING THE SERVICES, YOU ACKNOWLEDGE YOU HAVE READ AND UNDERSTAND THE POLICY AND THAT WE WILL COLLECT, USE AND DISCLOSE YOUR INFORMATION AS SET FORTH BELOW.

Please note that some of our Services are provided to legal entities that have entered into a customer agreement with us (“Customers”) to provide our Services to their end users (“Customer End Users”). In such circumstances, Ascend is the “data processor” or “service provider” to the Customer, and the Customer is the “data controller.” Ascend processes Customer End User information under the instructions of the Customer, or as the Customer otherwise permits, as described in the applicable customer agreement or as otherwise required by applicable law. In the event of a conflict between this Policy and the relevant customer agreement and any related data protection terms thereto, the services agreement will govern. If you are a Customer End User and you have questions about how your information is collected and processed through the Services, please contact the Customer with whom you are affiliated or which has provided your information to us for more information.

This Policy contains the following sections:

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The Information We Collect and Its Sources

The information we collect about you depends on the Services you use, how you use them, and the information you provide to us. We collect information in three main ways: (1) information you provide directly to us; (2) information we collect automatically through technology when you use the Services; and (3) information we collect from other sources.

(1) Information you provide directly to us.

When you use our Services, you may provide certain information directly to us. For example, you may provide us with information when you register to use the Services and create an account; use, access, or participate in the Services; subscribe to a newsletter; place an order or make a purchase from us; interact with us through social media; post comments, photos, or videos to the Services; participate in surveys or research; or communicate and interact with us for customer service or other purposes.

The categories of information we may collect directly from you (which could vary by affiliate or brand) include:

- **Contact and account identifiers**, such as name, address, telephone number, email address, and login credentials.
- **Commercial and financial information**, such as financial account information and purchase and transaction history. Note that sometimes your financial account information (e.g., credit card data) will be collected by our third-party payment processors on our behalf in connection with your purchase.
- **Sensory information**, such as video and voice recordings through our Services or as part of customer service interactions, or under limited circumstances, unique voiceprints of your voice generated to verify your identity when taking an exam or certification
- **Demographic information**, such as your interests, preferences, age, and gender.
- **Geolocation information**, which may be general location derived from your IP address or, with your consent, more precise GPS location information.
- **Professional or employment-related information**, you may provide us with data about yourself, including your educational background, résumé, work hours, scheduling, and other information, when you apply for a job with us or in connection with certain training or certification programs offered as part of the Services.
 - Note on time tracking. If you use certain Services (e.g., MedHub) and have enabled the time tracking app on your mobile device, we will collect the time you enter and the time you leave your clinical site campus to assist you in completing your timecard. The time tracking does not track your location once you have entered the campus or at any time you are off campus.
- **Educational information**, which may include information about your educational background, institution name, faculty evaluations, clinical activities, procedures performed, personal learning behaviors, competencies, test results, grades and scores, milestones, graduation dates, and various metrics related to your learning of particular subject matters, which may be collected and/or required in connection with our Services.
- **Protected classification information**, such as your race or ethnicity, where we are required or permitted by law to collect such information.
- **Inference information**, which is information we derive or infer about your potential interests and behaviors based on other information we collect.

Please note that some of the information we collect from and about you (race, ethnicity, voiceprint data, and precise geolocation information) is considered “sensitive information” under applicable laws. Ascend complies with these laws in its processing of sensitive information and does not process sensitive information for purposes other than business purposes for which a “right to limit” applies under applicable law.

A Note About Educational Records (FERPA) and Medical Records (HIPAA). In providing our Services, we are not directly covered by the U.S. Family Educational Rights and Privacy Act (“FERPA”) or the U.S. Health Insurance Portability and Accountability Act (“HIPAA”). However, to the extent we are required to comply with such laws by contract with an organization who provides your information to us or with which your use of our Services is affiliated, or with whom we share your information, and to the extent that such information provided to us is subject to FERPA or an equivalent law or regulation for your state or country of residence (“Student Data”), or HIPAA or an equivalent law or regulation for your state or country of residence, we will comply with such applicable law as required by such contract.

Please note that any information provided by an educational institution or by you for purposes of obtaining professional certifications or credentials, including, but not limited to, your contact information, data related to the results of certification exams or credential programs, data pertaining to your certification status, your continuing education information, and data related to recertification, if any, is deemed “Certification Data,” even if such data was originally subject to contractual restrictions as Student Data. Certification Data may be subject to disclosure to our accreditors, regulatory agencies, or other professional oversight bodies and, with respect to certification status, the general public. By accepting this Policy, you agree to the reclassification of your Student Data to Certification Data as provided in this section and to our use of such Certification Data in accordance with this Policy.

(2) Information we collect automatically through technology when you use the Services

When you use our Services, we may automatically collect certain information through a variety of third-party technologies, including cookies and similar tools. To the extent permitted by applicable law, we may use such information to make automated decisions, including using machine learning algorithms, about users of our Services in order to provide or optimize the Services, for security or analytics purposes, and for any other lawful purpose. Please refer to the Online Analytics and Advertising section below for further information regarding cookies.

Some of the information we automatically collect when you use our Services includes:

- Online/device identifiers, such as your IP address, MAC address, browser language, the state or country from which you accessed the Services (as derived from your IP address), and software and hardware attributes (including device IDs, operating system, and browser type).
- Internet or other similar network activity, including referring and exit URLs, the links you click and files you download, pages viewed and the order of those pages, the amount of time spent on particular pages, the terms you use in searches on our Services, error logs, the date and time you accessed the Services, and similar information.

(3) Information we collect from other sources and public forums

We may receive information about you from other sources, such as business partners, sponsors, Customers, educational institutions, marketers, researchers, analysts, social network services, and other parties to help us supplement our records. We may combine the information we collect from these sources with the other information we collect from and about you and use such combined information in accordance with this Policy.

Certain features of our Services may make it possible for you to share comments, photos, or other content publicly with other users. Any information that you submit through these features is not confidential, and we may use it for any purpose permitted by law. Please be aware that any information you post openly through the Services that is viewable by other users may be used and shared by such other users. Accordingly, please take care when using these features.

Online Analytics and Advertising

We may use cookies and similar technologies to operate and improve our Services, and to provide relevant advertising to you. A “cookie” is a unique numeric code that we transfer to your device browser so that we can keep track of your interests and/or preferences and recognize you as a return visitor to the websites. We may use cookies, log files, pixel tags, web bugs, web beacons, clear GIFs, or other similar technologies to collect information about the ways you interact with and use our Services, to support and enhance features and functionality, to monitor performance, to personalize content and experiences, for marketing and analytics, and for other lawful purposes. We refer to all of these technologies together as “cookies.” We may use the following types of cookies and similar technologies:

- **Strictly necessary cookies.** These cookies are required for the operation of our Services. They include, for example, cookies that enable you to log into secure areas.
- **Analytical/performance cookies.** We may use third-party web analytics services (such as those of Google Analytics) to collect and analyze usage information through cookies and similar tools; engage in auditing, research, or reporting; assist with fraud prevention; and provide certain features to you. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-out Browser Add-on by clicking [here](#). If you receive email from us, we may use certain analytics tools, such as clear GIFs to capture data such as when you open our message or click on any links or banners our email contains. This data allows us to gauge the effectiveness of our communications and marketing campaigns. We, our service providers, and our vendors may also use cookies and similar tools to collect information on how you use our Services, such as information about your browsing behavior, page visits, clicks and cursor movements, searches, customer service interactions, and screen recordings.
- **Functionality cookies.** These cookies remember choices you make and recognize you when you return. This enables us to personalize our content and remember your preferences (for example, your choice of language or region).
- **Advertising/Targeting Cookies.** We allow select third party advertising technology partners to place cookies or other tracking technologies on the browser of your device to collect information about you as discussed above. These third parties (e.g., ad networks and ad servers such as Google, Facebook, and others) may use this information to serve relevant content and advertising to you as you browse the Internet and access their own cookies or other tracking technologies on your browser to assist in this activity. If you are interested in more information about these online

advertising activities, and how you can generally control cookies from being put on your computer to deliver tailored advertising, you may visit the Network Advertising Initiative's Consumer Opt-Out link, the Digital Advertising Alliance's Consumer Opt-Out link, or Your Online Choices to opt-out of receiving tailored advertising from companies that participate in those programs. We do not control these opt-out links or whether any particular company chooses to participate in these opt-out programs. We are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms. Please note that if you use these mechanisms, you may still see advertising on our Services or across the Internet, but it will not be tailored to you based on your online behavior over time.

- You can also opt out of our online advertising practices by using our "[Your Privacy Choices](#)" management tool.

Cookies Management

Most internet browsers accept cookies by default. You can block cookies by activating the setting on your browser that allows you to reject all or some cookies. The help and support area on your internet browser should have instructions on how to block or delete cookies. Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject cookies or to alert you when a cookie is placed on your computer, tablet or mobile device. Although you are not required to accept cookies, if you block or reject them, you may not have access to all of the features available through our Services, such as tests, trainings or other activities.

How We Use Your Information

We may use the information we collect for the following business purposes:

- **To provide the Services you have requested**, such as to complete a purchase; to grant you access to our resources; deliver your training, certification, or assessment service; and track, analyze, and report on your progress, success, results, performance, registrations, incomplete attempts, predictive analytics, and results in connection with our Services.
- **To communicate with you**, for example, keeping you posted on purchases; Services updates; and changes to our terms, conditions, and policies.
- **For marketing and advertising purposes, when permitted by law**, including providing you with the latest Services announcements, promotions, and information about upcoming events via email, mail, phone, and SMS unless prohibited by contract. To opt out of marketing, please follow the unsubscribe instructions in the marketing communication or email us using the contact information below. Please note that it may take some time, consistent with applicable law, to process your request. Also, please note that your opt out will only apply to the specific Ascend entity that sent you a marketing communication.
- **To personalize your experience and customize the Services**, such as delivering relevant content and recommending features through our Services.
- **To respond to employment inquiries**, such as by processing your job application or facilitating your interview process.
- **To analyze use of the Services**, including performing research and analytics to understand how users interact with our Services and advertisements, and to assess our Customers' performance as compared to each other.
- **To improve our Services**, including bug detection and error reporting, improving usability and effectiveness of our Services, and to test and create new products, features, and services.
- **For our business operations**, including maintaining your account; providing customer service; and for legal compliance, such as detecting security incidents, complying with applicable law or legal requirements, protecting against malicious, deceptive, fraudulent, or illegal activity, and verifying compliance with our legal terms.
- **Other purposes for which we seek your consent**. We may also use your information for a specific purpose that we communicate to you. We will ask for your consent to process your information for such purpose in accordance with applicable legal requirements.

How We Disclose Your Information

We may disclose your information to the following entities:

- **Affiliates:** In accordance with applicable legal requirements and depending on our contracts with you or our Customers, we may share information among Ascend's various brands and entities for the business purposes as discussed above and in this Privacy Policy.
- **Researchers:** We may share your information to generate reports and analytics to be used by researchers or third parties in the industries or fields that we support to better understand changes and trends in such industries or fields.
- **Your Educational Institution, Employer, and other Organizations:** If you are using the Services as a Customer End User, we may share information about your use of the Services with your employer or educational institution (including relevant faculty and staff), in accordance with our services agreement with our Customers. We also may share information with governmental agencies, oversight organizations, professional organizations, accreditation organizations, and industry self-regulatory organizations where required or permitted by law. For more information about what information your employer or educational institution, if applicable, collects and how it uses and shares your information, please contact your employer or educational institution directly.
- **Social Networks:** We may share your information with social media platforms. For example, if you click on a Facebook "like" button on the Services, the "like" may appear on your Facebook account. Or you may choose to share information directly on these platforms using sharing plug-ins. To control this sharing of information, please review and adjust your privacy settings for the relevant social network. Depending on your privacy settings and actions on such network, we may share contact information, identification and demographic information, user-generated content, device information and identifiers, connection and usage data, and social media information.
- **Service Providers:** We engage vendors to perform business purposes, as described above, on our behalf and may disclose information to them to enable them to assist us with such business purposes, including research and analytics, hosting, transaction and payment processing, administration, test delivery, fraud prevention, identity management, and other services. Service providers may use such information for their operational purposes in order to provide their services to us.
- **Law Enforcement, Regulators, Anti-fraud Coalitions, Attorneys and similar organizations:** We share the information we collect, as appropriate, with these third parties when we have a good faith belief that such sharing is necessary to protect and enforce the legal rights, privacy, and safety of ourselves and our users; protect against possible fraud, misuse or misappropriation of our Services, or illegal activity; respond to requests from government and other authorities; protect our intellectual property rights and the integrity of our Services, and otherwise comply with legal process.
- **Business transactions:** In the event that Ascend, or any Ascend affiliate is involved in a merger, acquisition, transfer or sharing of control, bankruptcy, reorganization or sale of some or all assets, we may sell or transfer the information described in this Policy as part of that transaction or diligence associated with or in contemplation of such matters.

Choice

If personal data covered by this Policy is to be used for a new purpose that is materially different from that for which the personal data was originally collected or subsequently authorized, or is to be disclosed to a non-agent third party in a manner not specified in this Policy, Ascend will provide you with an opportunity to choose whether to have your personal data so used or disclosed. Requests to opt out of such uses or disclosures of Personal Data should be sent to us as specified in the "Contact Us" section.

Certain personal data, such as your race or ethnicity, is considered "Sensitive Information." Ascend will not use Sensitive Information for a purpose other than that for which it was originally collected or subsequently authorized by the individual, unless Ascend has received your affirmative and explicit consent (opt-in).

De-identified Information

We may de-identify information we collect so the information cannot reasonably identify you or your device, or we may collect information that is already in de-identified form. Our use and disclosure of de-identified information is not subject to any restrictions under this Privacy Policy, and we may use and disclose it to others for any purpose, without limitation.

Legal Bases For Use of Your Information

The laws of some jurisdictions, such as the European Union, the UK, and Brazil, require companies to tell you about the legal bases for processing your information. To the extent those laws apply, we rely on the following legal bases:

- **Performance of a contract:** where use of your information is necessary to provide you with the Services under a contract, for example the relevant Customer services agreement.
- **Legitimate interests:** where use of your information is necessary for our or others legitimate interests and where the use is not outweighed by your rights and interests. Some examples of such interests include:
 - providing and improving the Services
 - recognizing and better understanding our users
 - conducting security and fraud prevention activities
 - building and managing business-to-business relationships
 - conducting compliance and risk management activities
 - providing and managing access to our systems
- **Legal obligations:** where use of your information is necessary to comply with laws and regulations such as those relating to tax and accounting, complying with requests from government bodies or courts, or responding to litigation.
- **With consent:** we may ask for your consent to process your information in a certain way. Where we rely on this basis, you have the right to subsequently withdraw your consent.

Children

Most of our Services are intended for general audiences and are not directed at children. If we become aware that we have collected data without legally valid parental consent from children under an age where such consent is required in connection with such Services, we will take reasonable steps to delete it as soon as possible.

However, please note that we do provide limited Services directly to educational institutions that enter into agreements with us as Customers for their educational purposes (e.g., Kognito), and which might be used by students, including children under 13, at the direction of such Customer. In such circumstances, we serve as a “school official” to the school under FERPA and similar state student privacy laws, and collect, use, process, and share Student Data only in accordance with FERPA. Moreover, to process Student Data about children under 13, we rely on the educational institution Customer’s consent as an agent of the student user’s parent or legal guardian, as permitted by law. We limit the use of Student Data collected pursuant to the terms of the applicable Customer services agreement and secure such Student Data as required by law. We do not use Student Data for any commercial purpose, targeted advertising, profiling, or onward disclosure, unless we have the express consent of the student about whom the Student Data pertains and such student is of the age of consent. We also respond to requests by our educational institution Customers and parents related to Student Data (e.g., access or deletion).

Your Rights

Depending on where you live, you may have certain rights with respect to your information. Ascend will not discriminate against you for exercising these rights.

For example, you may be able to ask us to (or have an agent request on your behalf):

- provide access to certain information we hold about you, in some cases in a portable format, if technically feasible
- update or correct your information
- delete certain information
- restrict the use of your information
- object to certain processing activities (e.g., direct marketing)

We will respond to your request within the time period prescribed by applicable law. Please note that many of the above rights are subject to exceptions and limitations and may impact your ability to use our Services. For example:

- some Services can only be provided if we have your information, therefore deletion of your information will result in termination of such Services.
- we are required to retain some of the information we collect from and about you for certain periods of time for legal purposes or as required by the applicable Customer agreement.
- not all information about you can be changed in response to a correction request, such as your assessment scores or where we have records about how much time you spent working in a training module (which is subject to certain regulatory oversight rules that require retention).

We will take reasonable steps to verify your identity before fulfilling your request. You may submit your request through an authorized agent with written permission from you. Please note that if we receive a request from an authorized agent, we may still need to verify you before fulfilling the request.

Note that in certain circumstances and in accordance with applicable law, you may be able to appeal our response to your request. In such circumstances, we will provide you with additional information about your appeal rights and how to exercise them.

If you are using the Services as a Customer End User, please contact your employer, educational institution, or other organization that is our Customer to exercise your rights.

Notice of Right to Opt Out of Sales of Personal Information and Processing/Sharing of Personal Information for Targeted Advertising Purposes.

While we do not sell your information in exchange for money, as explained above, we may provide information about your device and online browsing activities to third-party advertising providers for targeted advertising purposes, so that we can provide you with more relevant and tailored ads regarding our services, and use analytics partners to assist us in analyzing the use of our Services and our user/customer base. The disclosure of your information to these third parties to assist us in providing these services may be considered a "sale" of personal information under applicable law or the processing/sharing of personal information for targeted advertising purposes.

If you would like to opt out of our online disclosure such as through cookie and pixel technology of your personal information for purposes that could be considered "sales" for those third parties' own commercial purposes, or "sharing" for purposes of targeted advertising, please click [here](#). Please note that you will need to exercise your right separately for each Ascend Service you use and on each browser and device you use to access such Services. You can also submit a request to opt out of our offline disclosures of information that are subject to applicable opt out rights by using the information in the "Contact Us" section below. Please note that we do not knowingly sell the personal information of minors under 16 years of age without legally-required affirmative authorization.

Please note that if you have a legally-recognized browser-based opt out preference signal turned on via your device browser, we recognize such preference in accordance with applicable law.

How We Protect Your Information

We maintain organizational, technical, and physical safeguards to help protect the information we collect and use. These safeguards vary depending upon a variety of factors including the sensitivity of the information we collect and use. Despite all reasonable practices, no security method is infallible. If you have any concerns regarding the security of your account, please inform us promptly using the contact information below.

Data Retention

We will keep your information only for as long as it is necessary to fulfill the purposes described in this Policy, unless a longer retention is required or permitted by law. We may delete or de-identify your information sooner if we receive a verifiable deletion request, subject to exemptions under applicable law. The retention period that applies to your information may vary depending on the Services you use and how you interact with them. We may retain cached or archived copies of your information.

Third Party Links and Features

The Services may contain links or other connections to other third-party websites, platforms, products, services or applications that are independent of our Services. The information collection practices and privacy policies of these third parties may differ from ours. We provide

links to you only as a convenience, and the inclusion of any link does not imply affiliation, endorsement or adoption by Ascend of any site or any information contained therein.

Privacy Information for California Residents

If you are a California resident, the California Consumer Privacy Act ("CCPA") requires us to provide you with the following additional information about: (1) the purpose for which we use each category of "personal information" (as defined in the CCPA) we collect; and (2) the categories of third parties to which we (a) disclose such personal information for a business purpose, (b) "share" personal information for "cross-context behavioral advertising," and/or (c) "sell" such personal information. Under the CCPA, "sharing" is defined as the targeting of advertising to a consumer based on that consumer's personal information obtained from the consumer's activity across websites, and "selling" is defined as the disclosure of personal information to third parties in exchange for monetary or other valuable consideration. As discussed in the "Online Analytics and Advertising" section above, our use of third-party analytics services and online advertising services may result in the sharing of online identifiers (e.g., cookie data, IP addresses, device identifiers, and usage information) in a way that may be considered a "sale" or "sharing" under the CCPA.

The following chart details these activities:

Category of Personal Information	Categories of Third Parties to Which Ascend Discloses this Personal Information for a Business Purpose	Categories of Third Parties to Which Ascend "Shares" or "Sells" this Personal Information
Contact and account identifiers	Affiliates; Researchers; Your Employer/Institution; Social Networks; Service Providers; Entities for Legal Purposes; Entities for Business Transactions	Advertisers and Ad Networks; Social Networks
Online/device identifiers	Affiliates; Advertisers and Ad Networks; Service Providers; Entities for Legal Purposes; Entities for Business Transactions	Advertisers and Ad Networks; Social Networks
Internet or similar network activity	Affiliates; Researchers; Your Employer/Institution; Advertisers and Ad Networks; Service Providers; Entities for Legal Purposes; Entities for Business Transactions	Advertisers and Ad Networks; Social Networks
Commercial and financial information	Affiliates; Your Employer/Institution; Service Providers; Entities for Legal Purposes; Entities for Business Transactions	We do not "share" or "sell"
Sensory information (e.g., photos and videos of you)	Affiliates; Researchers; Your Employer/Institution; Service Providers; Entities for Legal Purposes; Entities for Business Transactions	We do not "share" or "sell"
Demographic information	Affiliates; Researchers; Your Employer/Institution; Advertisers and Ad Networks; Social Networks; Service Providers; Entities for Legal Purposes; Entities for Business Transactions	Advertisers and Ad Networks; Social Networks

Geolocation information	Affiliates; Researchers; Your Employer/Institution; Service Providers; Entities for Legal Purposes; Entities for Business Transactions	We do not “share” or “sell”
Professional or employment-related information	Affiliates; Researchers; Your Employer/Institution; Service Providers; Entities for Legal Purposes; Entities for Business Transactions	We do not “share” or “sell”
Educational information	Affiliates; Researchers; Your Employer/Institution; Service Providers; Entities for Legal Purposes; Entities for Business Transactions	We do not “share” or “sell”
Protected classification information	Affiliates; Researchers; Your Employer/Institution; Service Providers; Entities for Legal Purposes; Entities for Business Transactions	We do not “share” or “sell”
Inference information	Affiliates; Advertisers and Ad Networks; Social Networks; Service Providers; Entities for Legal Purposes; Entities for Business Transactions	Advertisers and Ad Networks; Social Networks

For more information about each category of personal information, sources of such personal information, purpose of use, and the third parties to which we disclose or share information, please see the “[Information we Collect and Its Sources](#)”, “[Online Analytics and Advertising](#),” “[How We Use Your Information](#),” and “[How We Disclose Your Information](#)” sections above.

Your Choices Regarding “Selling/Sharing.” You have the right to opt out of our sale/sharing of your personal information for purposes of online analytics and advertising by clicking [here](#). To opt out of the offline disclosure of your information to third parties for these purposes, please contact us using the information in the “Contact Us” section below. You will need to exercise your opt out rights for each Ascend Service you use, and on each browser and device you use to access such Services.

Please note that if you have a legally-recognized browser-based opt out preference signal turned on via your device browser, we recognize such preference in accordance with applicable law.

Sensitive Information. The CCPA also allows you to limit the use or disclosure of your “sensitive personal information” (as defined in the CCPA) if your sensitive personal information is used for certain purposes. Please note that we do not use or disclose sensitive personal information other than for purposes for which you cannot opt out under the CCPA.

Notice Concerning Do Not Track. Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. We are committed to providing you with meaningful choices about the information collected on our websites for third party purposes, and that is why we provide the variety of opt-out mechanisms listed above. Some web browsers offer users a “Do Not Track” privacy preference setting in the web browser. We do not currently recognize or respond to browser-initiated Do Not Track signals. Please note that Do Not Track is a different privacy mechanism than the “Global Privacy Control” browser choice referenced above, which is a browser-based control that indicates whether you would like to opt out of the disclosure of your personal information for certain purposes.

Retention of Your Personal Information. Please see the “[Data Retention](#)” section above.

Financial Incentive Programs. The Services may offer opportunities to receive certain services or benefits such as discounts or free trial services, which may require the provision of personal information. Such opportunities could be considered “financial incentives” under California law (each, an “Incentive Program”). When you participate in an Incentive Program, you will be asked to agree to the terms of that Incentive Program and may revoke your participation depending on the Incentive Program. To the extent we can determine the value of your information, we consider the value of providing you with a more personalized experience as well as the expenses we incur in providing Incentive Programs that are reasonably related to the costs associated with offering the Incentives.

California “Shine the Light.” California residents can also request a list of all the third parties to which we have disclosed certain personal information (as defined by California’s Shine the Light law) during the preceding year for those third parties’ direct marketing purposes. California residents may contact us using the contact information provided below. In the body of your request, you must include: “California Shine the Light Request”, your name, a current California address including street address, city, state, and zip code, as well as sufficient information for us to determine if the law applies to you. You will need to attest to the fact that you are a California resident. We will not accept requests by telephone, email, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

Information for International Users

Ascend is a global company and has its headquarters in the United States. We may transfer your information to affiliates, service providers, and other third parties located outside of your country of residence, including in the United States. This is necessary to provide our Services and for the purposes outlined in this Privacy Policy. Data privacy laws vary from country to country and may not be equivalent to, or as protective as, the laws in your home country. We take steps to ensure that reasonable safeguards are in place with aim to ensure an appropriate level of protection for your information, in accordance with applicable law. These measures include data transfer agreements. By providing us with your information, you acknowledge and expressly agree to any such transfer, storage or use.

Ascend complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Ascend has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Ascend has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov>. The Ascend entities which maintain Certification and adhere to the Data Privacy Framework include Assessment Technologies Institute, LLC (ATI); MedHub, LLC; National Academy of Sports Medicine (NASM) / Athletics and Fitness Association of America (AFAA); ClubConnect, LLC; and National Healthcareer Association (NHA).

As explained in the “How We Disclose Your Information” section of this Policy above, Ascend discloses information to certain third parties that assist it in providing its Services. Ascend discloses information to third parties in accordance with applicable law. To the extent Ascend discloses information to third parties acting as agents on its behalf, Ascend will remain liable under the DPF principles if the agent processes such information in a manner inconsistent with the DPF principles, unless Ascend proves that it is not responsible for the event giving rise to the damage.

If you are a resident of the EU, UK, or Switzerland, you may direct any questions or complaints concerning our Certifications to the contact information listed below. We will work with you to resolve your issue. In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Ascend commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to JAMS, to an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://www.jamsadr.com/DPF-Dispute-Resolution> for more information or to file a complaint. The services of JAMS are provided at no cost to you.

If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See <https://www.dataprivacyframework.gov/framework-article/ANNEX-I-introduction>.

Ascend is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

Updates to Our Privacy Policy

We reserve the right to amend this Privacy Policy at any time to reflect changes to our practices or the law. Please check the Services periodically for updates. The date at the top of the Privacy Policy tells you when it was last materially updated. If we make material changes to the way we collect or use your information, you will be provided with appropriate notice, including by, but not limited to, posting the updated Policy on the Services, and providing notice in accordance with legal requirements. Any changes to this Privacy Policy will become effective when the revised Privacy Policy is posted. By continuing to use the Services following any changes to this Privacy Policy, you acknowledge you have read and understand the updated Privacy Policy, and you understand that we will collect, use, and disclose information as stated therein.

Contact Us

For any questions or complaints about this Privacy Policy or our privacy practices, please **contact the relevant Ascend entity or brand listed below:**

- [Advanced Practice Education Associates \(“APEA”\)](#)
- [Ascendlearning.com](#)
- [ATI Nursing \(“ATI”\)](#)
- [Board Vitals](#)
- [CDX](#)
- [ClickSafety](#)
- [ClubConnect](#)
- [ECSI](#)
- [ExamFX](#)
- [Jones & Bartlett Learning](#)
- [Kognito](#)
- [MedHub](#)
- [National Academy of Sports Medicine /AFAA \(“NASM”\)](#)
- [National Healthcareer Association \(“NHA”\)](#)
- [Nursing CE](#)
- [Public Safety Group](#)

Effective February 2024